

7:24mj43

ATTACHMENT A

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, Frank H. Figgers, III, Task Force Officer, United States Postal Inspection Service, having been duly sworn under oath, state as follows:

1. Your affiant is a certified police officer employed full time with the Virginia State Police and holds the rank of Special Agent. I am currently assigned as a Task Force Officer with the United States Postal Inspection Service (“USPIS”) assigned in the Roanoke, Virginia Domicile. I am authorized to investigate criminal and civil matters related to the United States Postal Service and the mails; serve warrants and subpoenas; make arrests; carry firearms; make seizures of property; administer oaths; and perform such other official duties as may be established by the Chief Postal Inspector. I have been employed as a sworn officer with the Virginia State Police since January 1989 and have worked the drug interdiction arena with the Virginia State Police since 2003. My work has included highway drug interdiction and parcel interdiction at other commercial parcel businesses. I have received formal training in conducting criminal investigations into drug trafficking and money laundering organizations that utilize the United States Postal Service (“USPS”). During my tenure as a Special Agent, I have conducted and participated in numerous investigations of criminal activity that have violated both federal and state law.

2. I know based on training and experience that the U.S. Mail is often used by drug trafficking organizations to transport controlled substances and proceeds from the sale of

controlled substances. I know based on training and experience that USPS Priority Mail and Priority Mail Express are commonly used to transport controlled substances, and drug trafficking proceeds, because drug traffickers can track parcels, control dispatch times and locations, and have a guarantee of delivery in one to three days.

3. This affidavit is submitted in support of an application for a search warrant of a USPS Priority Mail parcel bearing tracking number “9505 5141 4196 4078 0184 15” for controlled substances and/or the proceeds from drug trafficking. The parcel (hereafter referred to as Parcel #1) is described as follows:

- a. Addressee: Shirley Hughes, 4424 Harford Cir. NW, Roanoke, VA 24012.
- b. Return Address: Mary Hughes, 8422 Ives St, Paramount, CA 90723.
- c. Postage Affixed: Origin: Buena Park, CA, Postage: \$95.70 Date: March 18, 2024
- c. Tracking Number: 9505 5141 4196 4078 0184 15 (Parcel #1)
- d. Description: Brown cardboard box bearing USPS Priority Mail postage label, dimensions 17” x 11” x 13”
- e. Weight: 20 pounds 1.0 oz

BACKGROUND

4. On September 1, 2023, Postal Inspector Nathan Buck with the U.S. Postal Inspection Service intercepted a parcel addressed to Charmaine Hughes, 4424 Harford Circle NW, Roanoke, VA 24012. This previous parcel had a return address of Crystal Hughes, 12725 Biola Ave, La Mirada, CA 90638. La Mirada, CA is approximately 10 miles from Paramount, CA This previous parcel had a weight of 6lbs, 6oz. PI Buck obtained Federal Search Warrant 7:23mj104

from the Honorable Robert S. Ballou. Search warrant 7:23mj104 was executed on September 1, 2023, and this previous parcel was found to contain approximately 2,107 grams of THC oil vape cartridges (Hashish).

PROBABLE CAUSE

5. On March 19, 2024, your affiant identified information pertaining to Parcel #1 while examining postal business records and requested postal management re-route Parcel #1 to the USPS for further examination. On March 20, 2024, your affiant took custody of Parcel #1 at the Roanoke Post Office. Parcel #1 was mailed from Buena Park, CA post office and paid in cash. California is a known source area for parcels containing controlled substances mailed into the Western District of Virginia. Parcel #1 is a brown cardboard box bearing a USPS Priority Mail postage paid label. The return address is listed as Mary Hughes, 8422 Ives St, Paramount, CA 90723. The recipient is listed as Shirley Hughes, 4424 Harford Cir. NW, Roanoke, VA 24012. A photograph of Parcel #1 is attached as Exhibit #1.

6. A search of postal business records revealed six (6) prior USPS Priority Mail parcels were mailed from Cypress, CA and Buena Park, CA to the destination address of 4424 Harford Cir. NW, Roanoke, VA 24012 from July 18, 2023 to March 07, 2024, ranging in weight from 2lbs to 6lbs. A previous parcel mailed on March 07, 2024 was addressed to "Shirley Hughes", with return address of Ashley Hughes, 9741 Rome St, Cypress, CA 90630. The previous parcel mailed on March 07, 2024 appears to be the similar style of handwriting on the label with similar

characteristics on certain letters and numbers. This previous parcel has the same recipient as listed on Parcel #1. A search of postal business records revealed no prior parcels were mailed from Roanoke, VA to 8422 Ives Street, Paramount, CA 90723. “Shirley Hughes” could not be associated to 4424 Harford Cir. NW, Roanoke, VA 24012. CLEAR reports a “Shirley Carter” to be associated to 4424 Harford Cir. NW, Roanoke, VA 24012 as recently as January 17, 2024.

7. I utilized CLEAR to conduct searches for information related to Parcel #1. Your affiant was able to determine thru CLEAR that “Mary Hughes” is not associated to 8422 Ives Street, Paramount, CA 90723. CLEAR reported a subject by the name of “A.T.” to be associated with 8422 Ives Street, Paramount, CA 90723 as recently as October 31, 2023.

8. At this time, Parcel #1 is located at the USPIS-Roanoke Domicile in the Western District of Virginia. The parcel has been maintained unopened, in my custody, pending application for a search warrant.

9. Based on the facts set forth in this affidavit, I respectfully submit that probable cause exists to believe that the USPS Priority Mail parcel bearing tracking number “9505 5141 4196 4078 0184 15,” addressed to “Shirley Hughes, 4424 Harford Cir. NW, Roanoke, VA 24012” bearing a return address of “Mary Hughes, 8422 Ives St, Paramount, CA 90723” contains controlled substances, and/or the proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).

Frank H. Figgers, III

Frank H. Figgers, III
Task Force Officer, USPIS

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by reliable electronic means; specifically, by telephone, on the 20th day of March 2024.



The Honorable C. Kailani Memmer
United States Magistrate Judge
Western District of Virginia